

Commonwealth of Kentucky
Division for Air Quality
REVISED PERMIT STATEMENT OF BASIS

Final
Conditional Major, Construction / Operating
Permit: F-07-014R2
AEP Industries, Inc.
123 Willamette Lane
Bowling Green, Kentucky 42101
July 30, 2008
Frough Sherwani, Reviewer
SOURCE ID: 21-227-00090
SOURCE A.I. #: 40031
ACTIVITY ID: APE20080001

REVISION 2 (MINOR REVISION):

On July 16, 2008, the Division received an application from the source for a minor revision to their conditional major permit F-07-014R1.

With this application the source is requesting to remove flexographic presses # 203, #204, #205, # 206 and Catalytic Oxidizer # 2. After this removal the source will end up with two flexographic presses (EP # 4 and 5), Catalytic Oxidizer # 2 and following insignificant activities:

1. Distillation system (Capacity: 10,000 gallons/year)
2. Four Extruders
3. Cutting/Packaging
4. 16 Resin Pellet Storage Silos
5. Two Laminators
6. One Resin Pellet Reclaiming Process

The current source wide emission allowable for VOC will remain unchanged at 90 tons per rolling 12-month period.

SOURCE DESCRIPTION:

AEP Industries Inc. operates facility in Bowling Green, Warren County, Kentucky. The facility manufactures plastic bags under SIC 2643. APE Industries Inc. is currently operating under permit no F-95-020.

The source has four flexographic presses (press # 3, # 4, #5, # 10), two catalytic oxidizers, and a number of insignificant activities.

There are three additional presses (Press # 202, 207 and 208) which are not in operation. Those presses scheduled to be removed from the plant shortly.

On January 22, 2001, the Division received a renewal/name change application. The name change request from “Cello Bag Company Inc.” to “AMCOR Flexibles Inc.”

On January 19, 2003, the Division received another name change application. The name change request from “AMCOR Flexibles Inc.” to “Mercury Plastics, Inc.”.

On November 16, 2006, the Division received name/owner change application. The name change request from “Mercury Plastics, Inc.” to “AEP industries Inc.”.

COMMENTS:

Type of control and efficiency:

The source has two natural gas catalytic oxidizers (CO #1 and CO #2). VOC emissions from presses # 3, #4, # 5 and #10 are vented to both oxidizers.

Catalytic Oxidizer # 1

To control VOC emissions from presses # 3, 4, 5 and 10

Description:

Destruction Efficiency:	99.4% tested on April 15, 2004
Rated capacity:	5.0 MMBtu/hr
Fuel usage:	Natural Gas
Construction Commenced:	August 1993

Catalytic Oxidizer # 2

To control VOC emissions from presses # 3, 4, 5 and 10

Description:

Destruction Efficiency:	96.7% tested on April 16, 2004
Rated capacity:	5.0 MMBtu/hr
Fuel usage:	Natural Gas
Construction Commenced:	September 1995

Emission factors and their source:

AP – 42 5th edition, and mass balance (MSDS) are used for the emission factors for PM, VOC and HAPS.

APPLICABLE REGULATIONS:

401 KAR 52:030. Federally-enforceable permits for nonmajor sources.

PRECLUDED REGULATIONS:

401 KAR 59:210. New fabric, vinyl and paper surface coating operations.

The source has accepted a facility-wide limit on annual VOC emission of no more than 90.0 tons to preclude the applicability of 401 KAR 59:210. The actual VOC emissions shall be calculated based on 12-month rolling total.

401 KAR 59:212. New graphic arts facilities using rotogravure and flexography

The source has accepted a facility-wide limit on annual VOC emission of no more than 90.0 tons to preclude the applicability of 401 KAR 59:212. The actual VOC emissions shall be calculated based on 12-month rolling total.

EMISSIONS AND OPERATING CAPS DESCRIPTIONS:

The source has accepted a facility-wide cap on annual VOC emissions of no more than 90.0 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by a combination of record keeping, material balance and the operation of the oxidizers specified in the terms and conditions of the permit.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.